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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

12 LEONA GONZALES, an individual,
13 Plaintiff,

14 vs.

15 DEPOSITORS INSURANCE COMPANY;
16 NATIONWIDE MUTUAL INSURANCE
17 COMPANY; DOES I through X; and ROE
18 BUSINESS ENTITIES I through X, inclusive,
19 Defendants.

CASE NO. 2:20-cv-02010-APG-NJK

**STIPULATION AND
~~PROPOSED~~ ORDER TO
EXTEND DEADLINE FOR
PLAINTIFF TO FILE HER
REPLY TO DEFENDANTS
DEPOSITORS INSURANCE
COMPANY AND NATIONWIDE
MUTUAL INSURANCE
COMPANY'S OPPOSITION TO
PLAINTIFF'S MOTION TO
REMAND**

(First Request)

20
21 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff LEONA
22 GONZALES, through her counsel of record, Dennis M. Prince and Kevin T. Strong of
23 PRINCE LAW GROUP, and Defendants DEPOSITORS INSURANCE COMPANY and
24 NATIONWIDE MUTUAL INSURANCE COMPANY, through their counsel of record,
25 Robert W. Freeman, Priscilla L. O'Briant, and Jennifer A. Taylor of LEWIS BRISBOIS
26 BISGAARD & SMITH LLP, that the deadline for Plaintiff to file her Reply to
27 Defendants' Opposition to Plaintiff's Motion to Remand shall be extended from
28 December 15, 2020 to December 24, 2020. The Opposition was filed on December 8,



2020. This is the first request for extension of time for Plaintiff to file her Reply to Defendants' Opposition. This Stipulation and [Proposed] Order is submitted in accordance with LR IA 6-1.

The parties request this brief extension because counsel for Plaintiff is currently finalizing briefing to be submitted in a matter pending before the United States Supreme Court styled as *Liberty Mutual Fire Insurance Company v. Volungis, et al.*, Case No 20-208. This short extension of time will allow Plaintiff to fully address each of the arguments set forth in Defendants' Opposition to aid this Court in its ultimate decision as to whether this matter should be remanded back to state court.

Accordingly, the parties respectfully request this Court to approve the foregoing stipulation. Their requested extension is not made in bad faith or to unnecessarily delay these proceedings.

DATED this 15th day of December, 2020.

DATED this 15th day of December, 2020

PRINCE LAW GROUP

**LEWIS BRISBOIS BISGAARD &
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ORDER

IT IS SO ORDERED.

DATED this 15th day of December, 2020.


UNITED STATES DISTRICT JUDGE